



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 24, 2023

The Honorable Laura Taylor Swain
Chief United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

The Honorable George B. Daniels
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

**Re: *United States v. Carlo Alloni, 18 Cr. 350 (GBD)*
 *United States v. Telefonaktiebolaget LM Ericsson, 19 Cr. 884 (LTS)***

Your Honors:

The Government respectfully submits this letter regarding the above-captioned factually related cases and, in particular, to request a sentencing date for defendant Carlo Alloni.

Alloni pleaded guilty before Judge Daniels in *United States v. Carlo Alloni, 18 Cr. 350 (GBD)*, in 2018, pursuant to a cooperation agreement with the Government. The Government, with the consent of Alloni's counsel, now requests that the Court (i) direct the United States Probation Office to begin preparing the Presentence Report, and (ii) schedule a date for sentencing in approximately 90 days.

The Government notes that, assuming Alloni continues to abide by his cooperation agreement, the Government presently intends to file a Section 5K1 motion on his behalf, principally in light of the substantial assistance he provided in *United States v. Telefonaktiebolaget LM Ericsson, 19 Cr. 884 (LTS)*.

Should the Court desire any further information, we would be pleased to comply.

Respectfully submitted,

Damian Williams
United States Attorney

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cc: Defense Counsel